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**From:** Echeverria, Marietta [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=36C56B7169144626BD6AADEA25992D4E-MARIETTA ECHEVERRIA]  
**Sent:** 10/8/2021 2:02:09 PM  
**To:** Li, Jake [Li.Jake@epa.gov]  
**Subject:** RE: Follow up Debrief on Sept. 9 AAPCO meeting about 24(c)

Thank you

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**From:** Li, Jake <Li.Jake@epa.gov>  
**Sent:** Thursday, September 30, 2021 3:22 PM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Bohnenblust, Eric <Bohnenblust.Eric@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Cc:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Subject:** RE: Follow up Debrief on Sept. 9 AAPCO meeting about 24(c)

Another update after speaking with Michal and Ed this morning. It looks like although everyone's policy desire is to maintain the flexibility of 24(c), folks also don't see the legal argument for continued use of 24(c) to limit uses, given the plain language of 24(c) and 24(a). Thus, we don't expect that the memo from OGC (which we'll probably see next week) will create a path for 24(c). Instead, we'll probably be in the position of having to work with states to figure out how to make 24(a) work. It appears that although no one wants to go down that path (policywise), we might have no other choice (legally). If I hear any more updates before next week, I'll let you know. But for now, I wanted to preview where this issue is likely to end up.

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**From:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Sent:** Wednesday, September 29, 2021 4:24 PM  
**To:** Li, Jake <Li.Jake@epa.gov>; Bohnenblust, Eric <Bohnenblust.Eric@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Cc:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Subject:** RE: Follow up Debrief on Sept. 9 AAPCO meeting about 24(c)

Great, thanks for the update!

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**From:** Li, Jake <Li.Jake@epa.gov>  
**Sent:** Wednesday, September 29, 2021 11:18 AM  
**To:** Bohnenblust, Eric <Bohnenblust.Eric@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Cc:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Subject:** RE: Follow up Debrief on Sept. 9 AAPCO meeting about 24(c)

Morning all – Quick update from OGC call this morning. OGC has just sent a draft memo on 24(a) / 24(c) legal arguments to Marianne Engelman-Lado for her review. We should be seeing that memo this Friday or early next week, so more soon.

Jake

-----Original Appointment-----

**From:** Bohnenblust, Eric <Bohnenblust.Eric@epa.gov>

**Sent:** Tuesday, September 21, 2021 8:56 AM

**To:** Bohnenblust, Eric; Maignan, Tawanda; Echeverria, Marietta; Rosenblatt, Daniel; Li, Jake

**Cc:** Aubee, Catherine

**Subject:** Follow up Debrief on Sept. 9 AAPCO meeting about 24(c)

**When:** Tuesday, September 28, 2021 2:00 PM-2:30 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

Let's discuss thoughts on the points raised by AAPCO (summarized in the attached word document) and discuss potential next steps for consideration.

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